

FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR. NO. 2:23-cr-20191-MSN-5

EMMITT MARTIN, III,
TADARRIUS BEAN, DEMETRIUS
HALEY, DESMOND MILLS, JR.,
AND JUSTIN SMITH

Defendant.

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant, Justin Smith, (hereinafter Smith) by and through counsel, namely Martin Zummach, and moves this Honorable Court to modify the conditions of his release as follows:

1. Based upon the current detention and release order, as an additional condition to release, Smith is required to “continue or actively seek employment.”
2. Smith moves this Court to modify these conditions by permitting him to provide in home parental care for his infant son while the child’s mother and Smith’s wife performs professional employment outside the home in order to earn income sufficient for the family to meet minimal subsistence.
3. That counsel for Smith has consulted AUSA, David Pritchard, and he has no objection to this modification.

Respectfully submitted,

SPARKMAN-ZUMMACH, P.C.

S/Martin Zummach

Martin Zummach (#16352)

Attorney for Justin Smith

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Certificate of Service

The undersigned certifies that on the 30th day of October, 2023, a copy of the foregoing document was electronically filed with court clerk using the CM/ECF System which sent notification of such filing to all counsel of record.

S/Martin Zummach